

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

DIGITAL MEDIA TECHNOLOGY  
HOLDINGS, LLC,

Plaintiff,

V.

DISNEY MEDIA & ENTERTAINMENT  
DISTRIBUTION LLC

Defendant.

C.A. No. 22-1642-CJB

**STIPULATION AND [PROPOSED] ORDER STAYING  
LITIGATION PENDING *INTER PARTES* REVIEW PROCEEDINGS**

WHEREAS, the Patent Trial & Appeal Board (“PTAB”) has granted the petition of the defendant, Disney Media & Entertainment Distribution LLC (“DMED”), to institute *inter partes* review of asserted U.S. Patent No. 7,574,725 (IPR2024-00736, the “IPR”);

WHEREAS, DMED expressed its intention to move to stay this litigation pending the issuance by the PTAB of the Final Written Decision in the IPR; and

WHEREAS, the plaintiff, Digital Media Technology Holdings, LLC, does not oppose a stay of this action pending the issuance of the PTAB's Final Written Decision in the IPR;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the parties hereto, through their undersigned counsel and subject to the approval of the Court, that:

1. This action is stayed pending the PTAB's issuance of the Final Written Decision in the IPR.

2. The parties shall submit a joint status report with their proposals as to how this case should proceed within 14 days of the PTAB's issuance of the Final Written Decision in the IPR.

3. This stipulation and order is without prejudice to either party's right to request that the stay be lifted at any time prior to its expiration in the event a party believes circumstances so warrant.

/s/ Daniel A. Taylor  
Neal C. Belgam (#2721)  
Daniel A. Taylor (#6934)  
SMITH, KATZENSTEIN & JENKINS LLP  
1000 West Street, Suite 1501  
Wilmington, DE 19801  
(302) 652-8400  
nbelgam@skjlaw.com  
dtaylor@rlf.com

*Attorneys for Plaintiff Digital Media  
Technology Holdings, LLC*

Dated: October 7, 2024

/s/ Jason J. Rawnsley  
Robert W. Whetzel (#2288)  
Jason J. Rawnsley (#5379)  
RICHARDS, LAYTON & FINGER, P.A.  
920 North King Street  
Wilmington, DE 19801  
(302) 651-7700  
whetzel@rlf.com  
rawnsley@rlf.com

*Attorneys for Defendant Disney Media &  
Entertainment Distribution LLC*

SO ORDERED this \_\_\_\_\_ day of \_\_\_\_\_, 2024

---

THE HONORABLE CHRISTOPHER J. BURKE  
MAGISTRATE JUDGE  
UNITED STATES DISTRICT COURT  
DISTRICT OF DELAWARE